

## REMARKS

Claims 1-16 and 18-43 are pending in the present application with claims 1, 11, 12, 14, 15, 16, 18, 19, 21, 23, 25, 26, and 27 being the independent claims. Claims 1-15, 18-20, 25-33, and 39-41 are rejected under 35 U.S.C. § 102(b) as being anticipated by Broadwin (US 5,903,816). Claims 39 and 40 stand rejected under 35 U.S.C. § 112 as indefinite for depending from canceled claims. Claims 16, 21, 23, 36, and 37 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Broadwin in view of U.S. Publication No. 2005/0097619 (Haddad). Claims 22, 24, 38 stand rejected under 35 U.S.C. 103(a) as being unpatentable as allegedly being obvious over Broadwin, in view of Haddad and further in view of U.S. Publication No. 2004/0083184 (Tsuei).

### *Claim Rejections – 35 U.S.C. § 112*

With respect to claims 39 and 40, Applicants have amended the claims to depend from claim 18. Applicants respectfully request reconsideration of the § 112 rejections.

### *Claim Rejections – 35 U.S.C. § 102(b)*

Independent claim 1 recites in part:

- receiving a first video signal constituting a primary image;
- receiving a second video signal constituting a secondary image;
- combining the first and second video signals to form a broadcast video signal representing a composite of the primary and secondary images;
- receiving a specification of a predetermined location in at least one of the primary and secondary image as a specified portion of the composite image;
- generating instructions to form an interactive television client application program which renders the specified portion of the composite image as a location for a sensitive area;
- generating instructions for a virtual channel to be displayed in said sensitive area, said virtual channel comprising a plurality of secondary screens, wherein the data for said screens is to be loaded into said screens from storage; and

outputting the instructions to form said interactive television client application, said virtual channel, and the broadcast video signal for transmission to a customer location.

With respect to claim 1, Applicants respectfully submit that claim 1 patentably defines over Broadwin for at least the following reason. Applicants submit that Broadwin does not teach a datastream comprising “generating instructions for a virtual channel to be displayed in said sensitive area, *said virtual channel comprising a plurality of secondary screens*, wherein *the data for said screens is to be loaded into said screens from storage*.”(emphasis added) In Broadwin “the video delivery system *provides a plurality of program channels* ... [and] the video delivery system provides at least one ... *still image channel*.” (Broadwin col. 8, lines 17 – 25) According to Broadwin, “it is noted that the still image channel comprising ... still video images is on a *different channel*.” (Broadwin col. 8, line 34)(emphasis added). More specifically, the interactive program contains *hyperlinks* to the still images on a different channel. If the user selects one of these thumbnails the customer’s TV “*examin[es]* ... *HTML data* to determine which of the plurality of still video images corresponds to the user selection [[and]] ... *captures* the still image that is being broadcast ... and *displays* the still image on the television screen.” (Broadwin at col. 15, lines 59 – 61). Claim 1 as recited patentably defines over Broadwin because claim 1 recites in part “generating instructions for a virtual channel to be displayed in said sensitive area, said virtual channel comprising a plurality of secondary screens, wherein the data for said screens is loaded into said screens from storage.”

Accordingly, Applicants respectfully request reconsideration of the rejection of claim 1.

Insomuch as claims 2 through 10, and claim 28 depend directly or indirectly from claim 1 they also patentably define over Broadwin for at least the same reason. Accordingly, Applicants respectfully request reconsideration of the rejection of claims 2 through 10 and claim 28.

With respect to independent claims 11, 12, 18, 25, these claims recite similar elements to that of claim 1, and are patentably distinct from Broadwin for at least the reason described above with respect to claim 1.

Insomuch as claims 29, 30, 33, 34, 35, 39, 40, 41, 42, and 43 depend directly or indirectly from claims 11, 12, 18, and 25, they too patentably define over Broadwin for at least the same reasons. Accordingly, Applicants respectfully request reconsideration of the rejection of claims 29, 30, 33, 34, 35, 39, 40, 41, 42, and 43.

Next, independent claim 15 recites in relevant part:

- video signals representing an image comprising a primary portion and a secondary portion,

- instructions for generating at least first and second sensitive areas,

- signals representing data for at least first and second virtual channel displays

- processing the signals representing data and caching the data at the viewer location;

- processing the video signals at the viewer location to generate the image;

- executing the instructions at the viewer location to generate at least first and second sensitive area displays overlaid upon the image;

- receiving a viewer input selecting the first sensitive location;

- responding to selection of the first sensitive location by retrieving and processing cached data to generate a first virtual channel video display which includes rendering visible the secondary portion of the image;

- receiving a viewer input selecting the second sensitive location;

- responding to selection of the second sensitive location by retrieving and processing cached data to generate a second virtual channel video display which includes rendering visible the secondary portion of the image.

With respect to claim 15, Applicants respectfully submit that claim 15 as recited patentably defines over Broadwin for at least the following reason. The Examiner has stated in part that "Broadwin discloses ... responding to selection of the first sensitive location by

retrieving and processing cached data to generate a first virtual channel video display.” (Office Action at p. 10). Applicants submit that claim 15 patentably defines over Broadwin because it recites in relevant part “receiving a *viewer input* selecting *the first sensitive location* [and] *responding to selection of the first sensitive location by retrieving and processing cached data* to generate a first virtual channel video display which includes rendering visible the secondary portion of the image.” (Emphasis added). Broadwin discloses “pre-caching ... still images which are *related to a still image selected by the user*” (Broadwin col. 11, lines 42-45)(emphasis added), i.e., *nothing is cached* until the user first selects *one* still image. Claim 15 is patentably distinct.

Accordingly, Applicants respectfully request reconsideration of the rejection.

Independent claim 26 recites similar elements to that of claim 15 and is patentably distinct from Broadwin for at least the same reason described above with respect to claim 15.

Accordingly, Applicants respectfully request reconsideration of the rejection of claim 26.

Independent claim 19 recites in part:

- receiving a first video signal constituting a primary image;
- receiving a second video signal constituting a secondary image;
- combining the first and second video signals to form a broadcast video signal representing a composite of the primary and secondary images;
- outputting the broadcast video signal for transmission to a customer location,
- generating first instructions to form an interactive television client application program which renders a specified portion of the composite image as a location for a sensitive area;
- receiving an operator input calling for expansion of display of the primary image so as to cover at least a part of the secondary image at a viewer location;
- responding to the operator input by generating second instructions in the interactive television client application program to display the primary signal in a full-frame mode at the viewer location; outputting the first and second instructions to the viewer location.

With respect to claim 19, Applicants submit that claim 19 as recited patentably defines over Broadwin for at least the following reason. In the present Office Action the Examiner stated that “Broadwin discloses ... “receiving an operator input calling for expansion of display of the primary image so as to cover at least a part of the secondary image at a viewer location.” (Office Action dated 11/20/06 at p. 12). Broadwin discloses “[a] selection option[s] [that] may be used to return to watching the audiovisual component of the AVI signal, i.e., to return to watching the television program.” (Broadwin at col. 11, lines 7 – 9). According to Broadwin, “each of the selection options is linked to at least one ... hyperlink.” (Broadwin col. 9, lines 65-66), i.e., Broadwin allows a user to click through a series of “options” or links, each link providing the user with content from another channel and one option allows the user to return to watching TV. Claim 19 is patentably distinct from this because claim 19 recites in part “receiving an operator input calling for *expansion of display of the primary image so as to cover at least a part of the secondary image* at a viewer location ... [and] generating second instructions in the interactive television client application program to *display the primary signal in a full-frame mode* at the viewer location.” Accordingly, Applicants respectfully request reconsideration of the rejection.

Insomuch as claim 20 depends from claim 19, Applicants submit that claim 20 is patentably distinct from Broadwin for at least the same reason. Accordingly, Applicants respectfully request reconsideration of the rejection of claim 20.

Independent claim 27 recites similar elements to that of claim 19 and is patentably distinct from Broadwin for at least the same reason described above with respect to claim 19.

Accordingly, Applicants respectfully request reconsideration of the rejection of claim 27.

### ***Claim Rejections – 35 U.S.C. § 103(a)***

Claims 16, 21, 36, and 37 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Broadwin in view of U.S. Publication No. (2005/0097619) herein referred to as Haddad.

Independent claim 16 recites in part:

signals representing at least first and second enhanced video display screens, and signals including instructions for generating sensitive areas at specified locations on the first and second enhanced video display screens for receiving viewer purchase requests;

receiving viewer input specifying a first desired enhanced video display screen;

processing the video signals at the viewer location to generate a video display of the first desired enhanced video display screen;

processing the instructions at the viewer location to generate a first sensitive area display overlaid upon the video display at the specified screen location on the first desired enhanced video display screen;

receiving a viewer input selecting the first sensitive area to request a first purchase;

storing data specifying the first purchase request in a purchase buffer;

receiving viewer input specifying a second desired enhanced video display screen;

processing the video signals at the viewer location to generate a video display of the second desired enhanced video display screen;

processing the instructions at the viewer location to generate a second sensitive area display overlaid upon the video display at the specified screen location on the second desired enhanced video display screen;

receiving a viewer input selecting the second sensitive area to request a second purchase;

storing data specifying the second purchase request in the purchase buffer; responding to a viewer request by displaying data representing the first and second purchase requests stored in the purchase buffer;

displaying sensitive areas to receive one of a viewer request to cancel the first and second purchases and a viewer request to execute the first and second purchases; and

generating purchase request signals if a viewer request to execute the purchases is received.

With respect to claim 16, Applicants respectfully submit that claim 16 patentably defines over Broadwin in view of Haddad. To establish a prima facie case of obviousness, *all* the claim limitations must be taught or suggested by the prior art. As stated by the Examiner "Broadwin discloses ... storing data specifying the first purchase request in a purchase buffer (*transaction server*) [and] ... Haddad discloses displaying data ... stored in [a] purchase buffer." (Office Action at p. 18- 19). More specifically, Broadwin teaches "[a] modem .. coupled .. a transaction server. Thus, if the user ... purchases a product, the transaction server receives this order and processes the order." (Broadwin at col. 7, lines 60-65). Haddad teaches *an order processing module* ... receiving an incoming phone call *over a modem...* if the customer enters an *order* ... sends *the order confirmation* ... *to the subscriber terminal.*" (Haddad at paragraph [0072] - [0080])(emphasis added). Applicants submit that claim 16 as recited includes "receiving a composite signal at *the viewer location* ... [and] *storing data specifying the first purchase request in a purchase buffer.*" (Emphasis added). As stated in the Application the "[i]nteractive television client application then causes data representing the tentative purchase decision to be *stored in memory of STB* in a *purchase buffer*" (Application at paragraph [0060]). Since all the claim limitations have not been taught or suggested by Broadwin in view of Haddad, Applicants respectfully request reconsideration of the obviousness rejection.

Insomuch as claims 36 and 37 depend directly or indirectly from independent claim 16 they to patentably define over Broadwin in view of Haddad for at least the same reason. Accordingly, Applicants respectfully request that the rejections of claims 36, and 37 be reconsidered.

Independent Claim 21 recites in part:

receiving a composite signal at the viewer location over a communications channel, the composite signal including video signals representing an image

comprising a primary portion and a secondary portion, an interactive signal including instructions for generating a plurality of sensitive areas, and signals representing data for a virtual channel display;

processing the signals representing data and storing the data at the customer location;

processing the video signal at the viewer location to generate the image;

processing the interactive signal at the viewer location to generate a first sensitive area on the image;

receiving a viewer input selecting the first sensitive area;

retrieving the stored data to generate a virtual channel video display which includes rendering the secondary portion visible;

processing the interactive signal at the viewer location to generate a second sensitive area on the image to receive viewer input of a customer I.D. number;

receiving a viewer input in the second sensitive area to store a customer I.D. number; and

processing the interactive signal at the viewer location to initiate a purchase transaction using the customer I.D. number.

With respect to claim 21, Applicants respectfully submit that claim 21 patentably defines over Broadwin in view of Haddad. To establish a prima facie case of obviousness, *all* the claim limitations must be taught or suggested by the prior art. Claim 21 as recited states “*receiving a viewer input selecting the first sensitive area [and] retrieving the stored data to generate a virtual channel video display which includes rendering the secondary portion visible.*” In support of the rejection the Examiner cited a portion of Broadwin that stated that the interactive decoder operates to “pre-caching ... still images which are related to a still *image selected by the user*” (Broadwin col. 11, lines 42-45), i.e., nothing is cached until the user selects one still image. Since all the claim limitations have not been taught or suggested by Broadwin in view of Haddad Applicants respectfully request reconsideration of the obvious rejection.



Insomuch as claim 22 depends from claim 21 it to is patentably distinct from Broadwin in view of Haddad for at least the same reason. Accordingly, Applicants respectfully request reconsideration of the obviousness rejection.

Independent claim 23 recites in part:

receiving a composite signal at the viewer location over a communications channel, the composite signal including video signals representing an image and an interactive signal including instructions for generating a plurality of sensitive areas;  
processing the video signal at the viewer location to generate the image;  
processing the interactive signal at the viewer location to generate a first sensitive area on the image comprising an interactive ad display;  
receiving a viewer input selecting the first sensitive area;  
processing the interactive signal at the viewer location to generate a second sensitive area on the image to receive viewer input of a customer I.D. number;  
receiving a viewer input in a second sensitive area to store a customer I.D. number;  
and  
processing the interactive signal at the viewer location to initiate an interactive ad activity using the customer I.D. number.

With respect to independent claim 23, Applicants submit that it patentably defines over Broadwin in view of Haddad for at least the following reason. To establish a prima facie case of obviousness, *all* the claim limitations must be taught or suggested by the prior art. Claim 23 recites in part “processing the interactive signal at the viewer location to initiate an *interactive ad activity* using the customer I.D. number.” Neither Broadwin or Haddad disclose claim 23 as recited. Accordingly, Applicants respectfully submit that claim 23 patentably defines over Broadwin in view of Haddad.

Insomuch as claim 24 depends from claim 23 it to is patentably distinct from Broadwin in view of Haddad for at least the same reason. Accordingly, Applicants respectfully request reconsideration of the obviousness rejection


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**PATENT**

### **CONCLUSION**

Applicants request the Examiner reconsider the rejections and issue a Notice of Allowance of all the claims.

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